

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

HEATHER MINICK,

Plaintiff,

v.

**METROPOLITAN GOVERNMENT OF
NASHVILLE, DAVIDSON COUNTY,
TENNESSEE, et al.**

Defendants.

Case No. 3:12cv0524

Judge Trauger

**STATEMENT OF UNDISPUTED MATERIAL FACTS IN SUPPORT OF THE
METROPOLITAN GOVERNMENT'S MOTION FOR SUMMARY JUDGMENT**

1. The Revised Second Amended Complaint in this case alleges a claim pursuant to 42 U.S.C. § 1983 that individual Defendants Matthew Barshaw, Morris Craven, Jeffrey Davidson, and Christopher Foster violated Mr. Minick's rights under the Fourteenth Amendment of the United States Constitution. *See* Rev. Am. Compl., Doc. No. 178.

RESPONSE:

2. The amount of the surety bond for the Sheriff for the period of September 1, 2010 through September 1, 2014 was \$50,000. *See* 2010 Bond attached to motion as Exhibit J.

RESPONSE:

3. The amount of the surety bond for the Sheriff for the period of September 1, 2014 through September 1, 2018 is \$100,000. *See* 2014 Bond attached to motion as Exhibit K.

RESPONSE:

4. The incident giving rise to this lawsuit occurred on May 30, 2011. *See* Rev. Am. Compl., Doc. No. 178.

RESPONSE:

5. This lawsuit was filed on May 24, 2012. *See* Compl., Doc. No. 1.

RESPONSE:

Respectfully submitted,

THE DEPARTMENT OF LAW OF
THE METROPOLITAN GOVERNMENT
OF NASHVILLE AND DAVIDSON COUNTY
SAUL SOLOMON (#11689)
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/s/Keli J. Oliver
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was served via the court's electronic filing system to the following:

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on this 7th day of May, 2015.

/s/Keli J. Oliver
Keli J. Oliver